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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:	§ CHAPTER 13
Nicholas Harrison Seitz, Jr.	§ CASE NO. 09-70535-HdH-13
AND	§
Ganel Beadle Seitz	§ HEARING DATE: 10/20/2010
DEBTOR(S)	§ HEARING TIME: 11:00 AM

MOTION TO MODIFY TERM OF CHAPTER 13 PLAN AFTER CONFIRMATION

1. The Debtor(s), by their attorney, state and represent as follows:
2. That since confirmation of the Chapter 13 plan on 2/18/2010, the Debtor(s) have completed all payments required under the confirmed plan.
3. That under §1328(a) of the Bankruptcy Code, "the court **shall** grant the debtor a discharge" if the Debtor has completed all payments under the plan.
4. That Debtor(s) confirmed plan required plan payments of \$537.00 for 60 months for a total plan base of \$31,112.00.
5. That on 8/24/2010, Trustee received and accepted the final payment required toward the plan base.
6. That Debtor(s) made the lump sum payment to the Trustee with funds received from proceeds of the sale of their homestead.
7. That Debtor(s) have paid off the Chapter 13 plan in good faith.
8. That Debtor(s) seek a modification under §1329(a) to decrease the plan term from 60 to 10 months.

WHEREFORE, the Debtor(s) move this honorable court to enter an order modifying the term of Debtor(s) confirmed Chapter 13 plan to 10 months, thereby allowing the Debtor(s) to receive a Chapter 13 Discharge Pursuant to 11 U.S.C. §1328(a), and to other and further relief to which they may be entitled.

Respectfully submitted,

/s/Monte J. White
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on August 31, 2010, on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtor(s)

<div> <div>Case 09-70535-hdh13</div> <div>Doc 59</div> <div>Filed 08/31/10</div> <div>Entered 08/31/10 15:22:24</div> <div>Desc Main</div> </div>		
Label Matrix for local noticing	1100 Commerce Street	Bank One Chase
0539-7	Room 1254	8333 Ridgepoint Dr
Case 09-70535-hdh13	Dallas, TX 75242-1305	Irving, TX 75063-5812
Northern District of Texas		
Wichita Falls		
Fri Aug 27 14:50:35 CDT 2010		
Capital 1 Bank	Chase	Chase
Attn: CO TSYS Debt Management	800 Brooksedge Blv	Po Box 15298
PO Box 5155	Westerville, OH 43081-2822	Wilmington, DE 19850-5298
Norcross, GA 30091-5155		
Chase Bank USA, NA	Citibank	City of WF, WFISD, Wichita County
PO Box 15145	Attn: Centralized Bankruptcy	CO Perdue Brandon Fielder Collins & Mott
Wilmington, DE 19850-5145	PO Box 20507	P.O. Box 8188
	Kansas City, MO 64195-0507	Wichita Falls, Texas 76307-8188
DISCOVER BANK	Discover Fin Svcs Llc	Eddie Halter Properties
DFS Services LLC	Po Box15316	4001 Call Field Rd
PO Box 3025	Wilmington, DE 19850-5316	Wichita Falls, TX 76308-2633
New Albany, Ohio 43054-3025		
First Bank	First Bank	IRS Special Procedures
2801 Midwestern Parkway Suite 200	4110 Kell Blvd	1100 Commerce St., Room 951
Wichita Falls, TX 76308-2850	Wichita Falls, TX 76309-4955	Mail Stop 5029 DAL
		Dallas, TX 75242-1001
LVNV Funding LLC its successors and assigns	Liberty National Bank	Monte J. White & Associates
assignee of Chase Bank USA, N.A.	629 Sw C Ave	1106 Brook Ave
Resurgent Capital Services	Lawton, OK 73501-4302	Wichita Falls TX 76301-5009
PO Box 10587		
Greenville, SC 29603-0587		
PRA Receivables Management, LLC	PRA Receivables Management, LLC	Recovery Management Systems Corporation
As Agent Of Portfolio Recovery Assocs.	As Agent Of Portfolio Recovery Assocs.	25 SE 2nd Ave. Ste. 1120
CO Chase Bank USA, N.A.	CO Citibank	Miami, FL 33131-1605
POB 41067	POB 41067	
NORFOLK, VA 23541-1067	NORFOLK VA 23541-1067	
Recovery Management Systems Corporation	WICHITA FALLS CITY, ISD & WICHITA COUNTY	Ganel Beadle Seitz
25 S.E. 2nd Avenue, Suite 1120	CO PERDUE BRANDON FIELDER COLLINS & MOT	1542 Norman
Miami, FL 33131-1605	PO BOX 8188	Wichita Falls, TX 76302-2926
	WICHITA FALLS TX 76307-8188	
Monte J. White	Nicholas Harrison Seitz Jr.	UST U.S. Trustee
Monte J. White & Associates, P.C.	3204 Martin Blvd	1100 Commerce Street
1106 Brook Avenue	Wichita Falls, TX 76308-2016	Room 976
Hamilton Place		Dallas, TX 75242-1011
Wichita Falls, TX 76301-5009		
Walter 12,13 OCheskey		
6308 Iola Avenue		
Lubbock, TX 79424-2735		

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Chase Bank USA, NA
PO Box 15145
Wilmington, DE 19850-5145

(u)Liberty National Bank

End of Label Matrix	
Mailable recipients	27
Bypassed recipients	2
Total	29